

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
Miami Division**

DONALD J. TRUMP,

*Plaintiff,*

v.

MICHAEL D. COHEN,

*Defendant.*

Case No. 23-cv-21377-DPG

**DEFENDANT’S MOTION FOR ENTRY OF ORDER ON DISCOVERY MATTERS  
RAISED DURING THE SEPTEMBER 5, 2023 HEARING**

Defendant Michael D. Cohen, pursuant to this Court’s Order Setting Discovery Procedures [D.E. 35], hereby moves the Court to enter the attached order reflecting the Court’s rulings during the September 5, 2023 hearing upon Defendant’s Motion for Hearing. [D.E. 52] The Proposed Order on Discovery Matters Raised During the September 5, 2023 Hearing is attached hereto as **Exhibit 1**. A copy of the transcript from the hearing is attached hereto as **Exhibit 2**.

Defendant respectfully requests that this Court enter the Proposed Order on Discovery Matters Raised during the September 5, 2023 Hearing and grant such other and further relief as this Court deems just.

Respectfully submitted,

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Counsel for Defendant Michael D. Cohen

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this September 11, 2023, a copy of this filing was submitted electronically via the CM/ECF system to all parties that have entered an appearance in this case and on the Court's electronic system.

By: /s/ Max A. Eichenblatt  
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